

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	Criminal No. <u>25-20156 JTF-tmp</u>
)	
v.)	18 U.S.C. § 844(e)
)	18 U.S.C. § 875(c)
)	18 U.S.C. § 2261A(2)(A)
ELENA BONETTI,)	18 U.S.C. § 2261A(2)(B)
)	18 U.S.C. § 2261(b)(5)
Defendant.)	18 U.S.C. § 2261(b)(6)
)	

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

Between on or about July 4, 2024, until on or about February 26, 2025, in the Western District of Tennessee, and elsewhere, the defendant,

ELENA BONETTI

did, with the intent to harass and intimidate E.M. and M.M., use any interactive computer service, any electronic communication service, any electronic communication system of interstate commerce, and any other facility of interstate and foreign commerce to engage in a course of conduct, including sending electronic messages to E.M. and M.M. that threatened acts of violence, that placed E.M. and M.M. in reasonable fear of death or serious bodily injury, and caused and attempted to cause, and would reasonably be expected to cause substantial emotional distress to E.M. and M.M., and did so in violation of an injunction or other order as described in Title 18, United States Code, Section 2266, all in violation of Title 18, United States Code, Sections 2261A(2)(A) and (B) and

2261(b)(5) and (b)(6).

COUNT 2

On or about July 4, 2024, in the Western District of Tennessee, and elsewhere,
the defendant,

ELENA BONETTI

knowingly and willfully transmitted in interstate and foreign commerce communications containing a threat to injure the person of another, to wit, the defendant sent an email that contained a threat to kill M.S. and others, specifically:

You don't know me, but happy firework day you devil worshipping COLT LEADER!! I hope you and your colt followers repent soon before you end up in hellfire damnation you ASS HOLES!!!!!! I'm paying you a visit soon ;) When I get ahold of my daddy's rifle every one of you colt devils will take a bullet in the back of your heads because GOD IS NOT MOCKED!!! OH NO HES NOT FATHER!!!!!! God has send me to take out the wicked thank you Jesus. First it's the WORTHLESS PIECE OF SHIT that abandoned me, then the liberals at Memphis university then you evil ass holes who stole my child and damned him to hellfire. Then I'm going home to Jesus thank you Lord!!!!!! You'll know who I am soon! I'll see you when you least expect it like a thief in the night!!!

All in violation of Title 18, United States Code, Section 875(c).

COUNT 3

On or about February 26, 2025, in the Western District of Tennessee, and elsewhere, the defendant,

ELENA BONETTI

through the use of an instrument of interstate commerce, to wit: an online submission to the Memphis airport website, flymemphis.com, willfully made a threat to kill by means of an explosive, specifically:

REPENT OF YOUR SINS BEFORE YOU DIE IN THE NAME OF JESUS!!
There's a bomb at the airport waiting to take you ALL out and the evil UofM
and MidAmerica seminary are NEXT! I hope that scares you to repent...

in and affecting interstate commerce, in violation of Title 18 United States Code, Section
844(e).

A T R U E B I L L:

F O R E P E R S O N

DATED: July 17th, 2025

JOSEPH C. MURPHY
INTERIM UNITED STATES ATTORNEY